

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CITY OF ALMATY, KAZAKHSTAN and BTA
BANK JSC,

Crossclaim Plaintiffs,

-against-

MUKHTAR ABLYAZOV, VIKTOR
KHRAPUNOV, ILYAS KHRAPUNOV, and
TRIADOU SPV S.A.,

Crossclaim Defendants.

No. 15-CV-05345(AJN) (KHP)

DECLARATION OF KATELYN K. BROOKS

I, Katelyn K. Brooks, hereby declare under penalty of perjury that the following is true and correct:

1. I am an attorney admitted to practice in the State of New York and before this Court, and I am an associate with Hoguet Newman Regal & Kenney LLP, counsel for Crossclaim Defendants Viktor and Ilyas Khrapunov (the “Khrapunovs”) in the above-captioned case.

2. I submit this declaration in support of the Khrapunovs’ response to the Letter Motion of April 19, 2017 filed by JSC BTA Bank and the City of Almaty (together, “BTA/Almaty”) requesting an order that the deposition of Ilyas Khrapunov take place at an agreed location other than Switzerland.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the U.S. State Department’s 2015 Human Rights Report for Kazakhstan.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the article *Russia, Iran accused of abusing Interpol to arrest foes*, Times of Isr. (Apr. 27, 2017), <http://www.timesofisrael.com/russia-iran-accused-of-abusing-interpol-to-arrest-foes/>.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Memorandum we received from Mangeat Attorneys-At-Law, dated April 27, 2017 regarding the process of taking a deposition in Switzerland.

Dated: May 2, 2017
New York, New York

/s/ Katelyn K. Brooks
Katelyn K. Brooks
Hoguet Newman Regal & Kenney, LLP
10 East 40th Street, 35th Floor
New York, NY 10016
Phone: 212-689-8808

*Counsel for Viktor Khrapunov and
Ilyas Khrapunov*